

***Remarks***

Reconsideration of this Application is respectfully requested.

Claims 48-121 are objected to because of the numbering informalities. Claims 1-42, 48(47)-72, 74-89, 94-102, 113, 114, 116 and 121 are rejected under 35 U.S.C. 102(b) as being anticipated by Hollenberg, U.S. Patent No. 6,091,956. Claims 90-93, 103-112, 115 and 117-120 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form, including all of the limitations of the base claim and any intervening claims.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Objections to the claims***

It appears that claim 47 was not included in the listing of claims in the previous response. Applicants have listed it above (in the same form as originally filed). Claims 48 and higher appear to be correctly listed. Applicants believe that this addresses the objections.

***Allowable claims***

Applicants thank the Examiner for indicating the allowability of claims 90-93, 103-112, 115 and 117-120. However, based on the remarks below, Applicants believe that other claims are also allowable.

*Rejections under 35 U.S.C. § 102(e)*

Claims 1-42, 48(47)-72, 74-89, 94-102, 113, 114, 116 and 121 stand rejected under 35 U.S.C. 102(b) as being anticipated by Hollenberg, U.S. Patent No. 6,091,956. These rejections are respectfully traversed. Considering, for example, claim 1, claim 1 recites “a wireless communication system configured to allow communication between said transponder and said transceiver, and a processor configured to find the target by **virtual triangulation** based on values of position information from said transponder and said transceiver.” Virtual triangulation inherently does not require any fixed infrastructure.

Hollenberg, on the other hand, teaches the opposite of what is claimed. Hollenberg describes what is known as **chronometric triangulation**. For example, Hollenberg’s claim 1 (col. 29, lines 40 – 45) states:

- b. radio locating means by which, from said location data including triangulation systems installed within and among buildings, the location of each of said mobile computers is determined and processed into location information including information pertaining to, and derivable from, the change in location of each of said mobile computers, and

This passage makes it clear that Hollenberg requires fixed infrastructure for his **chronometric triangulation** system (i.e., triangulation system components are installed within and among buildings), and such a **fixed** infrastructure is required for determining/monitoring the

location of the target (in Hollenberg's case, a mobile computer). Hollenberg also provides an example of a triangulation system in col. 4, lines 55 – 61:

55 A comparatively simple area-data communications system operates using high frequencies at sufficiently low power levels to avoid interference with neighboring systems. For example, in substantially enclosed areas a system consisting of multiple transceivers transmit a query signal to mobile transponder devices included in handheld personal computing devices. When the transponder responds with its identification sequence, its location is then computed  
60 through chronometric triangulation based upon transponder signal arrival times at the system receivers.

In other words, from this passage it also clear that in Hollenberg requires a fixed triangulation system with multiple fixed transceivers, and his method is **chronometric** triangulation (see line 60 in the passage above), **unlike the claimed virtual triangulation**. FIG. 1 of Hollenberg also shows components of a fixed infrastructure used in the chronometric triangulation.

In sum, Hollenberg's triangulation is quite real – there is nothing virtual about it, unlike what is claimed in the independent claims, and Hollenberg teaches away from what is claimed. Reconsideration is respectfully requested.

### ***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn.

Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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